Recommended revisions to ROP discussion

Required Progress

Federal law specifies that an ozone nonattainment area classified as serious and above must demonstrate ongoing emission reductions relative to a 1990 base year. Federal law requires a three percent per year reduction in VOC emissions from 1996 through attainment, and does not allow credit to be taken for certain federal motor vehicle control programs (FMVCP). Where both VOC and NOx emissions have been shown to contribute to high ozone levels, the Clean Air Act allows NOx emission reductions to be used to augment VOC emission reductions to demonstrate reasonable further progress. In this ROP demonstration, the level of NOx reductions needed to augment the VOC reductions is determined by the ratio of NOx emissions to VOC emissions in 1990, the base year for ROP determinations. To meet federal rate of progress requirements, this plan must demonstrate VOC-equivalent reductions of 42 percent in 2005 and 48 percent in 2007, when compared to the 1990 base year.

Table 1 demonstrates that the rate of progress projected for the Southeast Desert Modified AQMA, the air quality planning area as recognized by U.S. EPA, meets Clean Air Act requirements. The required rate of progress is met in part by substituting NOx reductions for VOC reductions at the rate of 1.6 tons NOx per ton of VOC shortfall. The Southeast Desert Modified AQMA consists of the Antelope Valley in Los Angeles County, the Mojave Valley and Victor Valley portions of San Bernardino County, and the Coachella Valley portion of Riverside County.

Table 1 - - Federal Reasonable Further Progress for the Southeast Desert Modified AQMA (tons per ozone season day)

	VOC		NOx	
	2005	**2007**	**2005**	**2007**
1990 Baseline Emissions	136.53	136.53	218.79	218.79
FMVCP Adjustment	-38.30	-38.62	0	0
Adjusted VOC Baseline	98.23	97.91	218.51	218.51
VOC Emission Target	56.97	50.91		
Emissions with Adopted Controls	68.90	66.35	180.35	170.7
VOC Shortfall	11.93	15.44		
NOx Available for Substitution			38.44	48.90
NOx Used for Substitution 2005				
Actual NOx			19.09	
VOC Equivalents	11.93			
Net NOx Available for Substitution 2007				29.00
NOx Used for Substitution 2007				
Actual NOx				24.70
VOC Equivalents		15.44		
Final Progress Shortfall	0	0		